Entered 08/24/09 13:59:43 Desc Main Case 07-00416 Doc 47 Filed 08/24/09

Page 1 of 1 Document UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN RE:

Case No.: 07 B 00416

Timothy M. Sadoski Lisa J. Sadoski

Chapter: 13

Debtor(s) | Judge A. Benjamin Goldgar

RESPONSE TO TRUSTEE'S NOTICE OF FINAL MORTGAGE CURE

TO: Glenn B. Stearns, Chapter 13 Trustee, 4343 Commerce Court, Suite 120, Lisle, IL 60532 Timothy M. Sadoski, Lisa J. Sadoski, Debtor(s), 35696 N. Poplar Ave., Ingleside, IL 60041 Kenneth Borcia, Attorney for Debtor(s), P.O. Box 447, Libertyville, IL 60048

Creditor objects to Trustee's Notice of Final Mortgage Cure filed on 08/19/2009. The claim amount listed in paragraph E.5. of the confirmed plan has not been paid in full. Creditor received lift of stay on 07/07/2009 and the claim was withdrawn.

Since the arrears have not been paid in full, the Trustee's Notice of Final Mortgage Cure is not valid and has no effect.

Pursuant to the terms of the confirmed plan, if no challenge to this response is made by motion filed with the court and served on the undersigned and the trustee within thirty days of this response or by 09/23/2009, GMAC MORTGAGE, LLC's response stands as filed.

PROOF OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice upon the parties listed above, by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527, before the hour of 5:00 PM on August 24, 2009.

> /s/ Joel P. Fonferko Attorney for Creditor

Berton J. Maley ARDC#6209399 Gloria C. Tsotsos ARDC# 6274279 Jose G. Moreno ARDC#6229900 Rachael A. Stokas ARDC#6276349 Peter C. Bastianen ARDC#6244346 Joel P. Fonferko ARDC#6276490 Maria A. Georgopoulos ARDC#6281450 Codilis & Associates, P.C. 15W030 North Frontage Road, Suite 100 Burr Ridge, IL 60527 (630) 794-5300 C&A FILE (14-07-1268)

NOTE: Pursuant to the Fair Debt Collection Practices Act you are advised that this law firm is deemed to be a debt collector attempting to collect a debt and any information obtained will be used for that purpose.